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Attorney for Defendants

FILED
DISTRICT COURT OF GUAM

SEP 20 2007

JEANNE G. QUINATA
Clerk of Court

DISTRICT COURT OF GUAM

UNITED STATES OF AMERICA,	(Criminal Case No. 07-00078
)	
Plaintiff,	(MOTION BY DEFENDANT
)	JUAN C. TENORIO TO DISMISS
vs.	(COUNT I OF THE INDICTMENT
)	
JUAN C. TENORIO and	(
CHARLENE F. TENORIO,)	
	(
Defendants.)	

Defendant Juan C. Tenorio respectfully moves that Count I of the indictment be dismissed on the ground that the indictment was not found within five years next after the bankruptcy case described in the said count was converted from

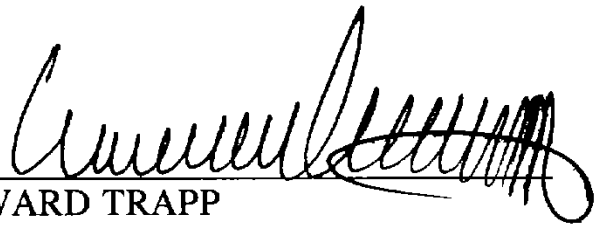
ORIGINAL

(MOTION BY DEFENDANT JUAN C. TENORIO TO DISMISS COUNT I OF
THE INDICTMENT)
Criminal Case No. 07-00078

a chapter 11 reorganization to a chapter 7 liquidation.

Dated, Hagåtña, Guam,

September 20, 2007.

A handwritten signature in black ink, appearing to read 'Howard Trapp', is written over a horizontal line.

HOWARD TRAPP
For HOWARD TRAPP INCORPORATED
Attorney for Defendants

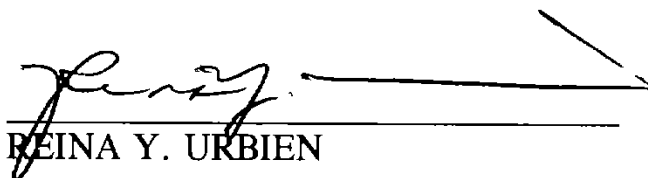
(DOCUMENTS/MOTIONS/DisIndict.JCTaitano)

DECLARATION OF SERVICE

I, Reina Y. Urbien, declare that I am an administrative assistant employed in the office of Howard Trapp Incorporated, Howard Trapp, Esq., the attorney for Defendants herein, and that on September 20, 2007, I served the document to which this declaration is annexed on Jeffrey J. Strand, Esq., First Assistant United States Attorney, the attorney for Plaintiff herein, by leaving a copy thereof at Office of the United States Attorney for Guam and the Northern Mariana Islands, Suite 500, Sirena Plaza, 108 Hernan Cortez Avenue, Hagåtña, Guam, his last known address, with a person in charge thereof.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 20, 2007, at Hagåtña, Guam.


REINA Y. URBIEN